

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

DANIEL BYRD

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§

CRIMINAL NO. 4:23-cr-00165-1

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Daniel Byrd, who respectfully requests this Honorable Court to enter an order continuing this cause and in support thereof would show as follows:

1. The United States Government is unopposed to this motion.
2. The case is currently scheduled for Pretrial Conference on August 21, 2023, and Trial on August 28, 2023.
3. Defendant is still in the process of completing discovery.
4. The Defendant has filed a waiver for a speedy trial.
5. This motion is not made for delay.

WHEREFORE, PREMISES CONSIDERED, Defendant requests that this Honorable Court grant this motion and reset the trial for 90 days or whichever date this Honorable Court sees fit.

Respectfully submitted,

PAUL DOYLE & ASSOCIATES, P.C.

By: /s/ Paul Doyle

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of August 2023, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Paul Doyle

Paul Doyle

Attorney for Daniel Byrd

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on the 11th day of August 2023, counsel spoke to Kim Leo, Assistant United States Attorney, stating that she was unopposed to this motion.

/s/ Trevor Sharon

Trevor Sharon

Attorney for Daniel Byrd